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Attorney for Defendant
HARTFORD LIFE AND ACCIDENT INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VIRGINIA ROLLINS,

Plaintiff,

v.

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY,

Defendant.

Case No. 2:22-cv-00969-JCM-NJK

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES**

(FIRST REQUEST)

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendants HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY (“Defendant”) and Plaintiff VIRGINIA ROLLINS (“Plaintiff”) (collectively, the “Parties”), hereby stipulate to amend the Discovery Plan and Scheduling Order (**ECF No. 15**) by extending the outstanding deadlines for a period of sixty (60) days.

This is the first request for an extension to the Discovery Plan and Scheduling Order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This request is submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

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DISCOVERY COMPLETED

This case is exempt from initial disclosures as an action decided upon the administrative record under Rule 26(a)(1)(B)(i). The parties do not anticipate discovery in this matter beyond the administrative record.

REASONS FOR REQUESTED EXTENSIONS

This extension is necessary as the parties have been engaged in settlement discussions and have agreed to privately mediate this matter. The parties desire to divert resources toward mediation at this time before incurring the time and expense of preparing dispositive motions.

PROPOSED REVISED DISCOVERY PLAN

C. Proposed Case Schedule and Deadlines

1. Dispositive Motions.

- The current deadline for Hartford to file a Motion for Summary Judgment is January 20, 2023. The parties request this deadline be extended to **March 21, 2023**.
- The current deadline for Plaintiff to file a Response to Defendant's Motion for Summary Judgment and Cross Motion for Summary Judgment is February 10, 2023. The parties request this deadline be extended to **April 11, 2023**.
- The current deadline for Hartford to file a Response to Plaintiff's Cross Motion for Summary Judgment is March 3, 2023, if desired. The parties request this deadline be extended to **May 2, 2023**.
- The current deadline for Plaintiff to file a Reply is March 17, 2023, if desired. The parties request this deadline be extended to **May 16, 2023**.

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2. Extensions or Modifications of the Scheduling Order.

Should an extension of any of the above-listed deadlines become necessary, absent extenuating circumstances constituting good cause and/or excusable neglect, the Parties will request such at least twenty-one (21) days in advance of the subject deadline pursuant to LR 26-3.

Dated: December 28, 2022

Dated: December 28, 2022

/s/ Martina B. Sherman, Esq.
JULIE A. MERSCH, ESQ.
LAW OFFICES OF JULIE A. MERSCH

/s/ Amy L. Thompson, Esq.
AMY L. THOMPSON, ESQ.
LITTLER MENDELSON

MARTINA B. SHERMAN, ESQ.
DEBOFSKY LAW, LTD.

Attorney for Defendant
HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY

Attorneys for Plaintiff
VIRGINA ROLLINS

IT IS SO ORDERED.

Dated: December 29, 2022


UNITED STATES MAGISTRATE JUDGE

4871-1337-6838.1 / 116071-1003